

Review of Vegetation Survey for The Proposed Hard Rock Resource-Haulage Routes

The following comments are made in relation to statements and outcomes contained within the PPK Report on the proposed haul route and their potential effect on vegetation issues. Our comparison is based on mapping of the Vegetation Ecosystems of the area affected by the proposed haul route.

Summary

The PPK vegetation assessment failed to identify 2 endangered ecosystems that will be intersected by the proposed haulage routes. It failed also to accurately describe the remaining ecosystems along the haulage corridors even when Certified Regional Ecosystems mapping by Department of Natural Resources and Mines and Vegetation data through the Herbarium (EPA) was available. As a result,

- the vegetation survey conducted by PPK is a misrepresentation of the vegetation communities that will be significantly disturbed by the construction of the proposed haul route, and
- the comments provided by the consultant on the effect the haul route will have on the regional ecosystem and how it can best be protected are incorrect.

Findings

- 1/ The PPK Vegetation Survey makes references to the *Vegetation Management Act 1999 (VMA1999)* and the conservation status of the Regional Ecosystems.
- 2/ The PPK report only identifies 2 regional ecosystems. The current certified regional ecosystem mapping version 3.1 (Herbarium EPA) clearly shows 11 regional ecosystems intersected by route options A to H. Refer Appendix (1)
- 3/ In the field survey 4.1.5.2 it states, "sites were selected to represent the various vegetation communities found along the route options". Investigation of these sites geographical positions in relation to the current RE Herbarium mapping reveals that:
 - 6 sites are wholly in cleared vegetation areas (3,6,7,11,15,16).
 - 6 sites are adjacent to cleared vegetation areas (5,8,10,12,13,14).
 - Only 4 sites are wholly contained within vegetation areas (1,2,4,9).
- 4/ The sites located adjacent to or located in cleared vegetation areas indicate a poor choice of planning. This would lead to the overall assessment of the vegetation communities to be highly degraded and as a consequence fail to provide a true representation of the vegetation communities that are known to exist within the area surrounding the proposed route.
- 5/ The report states that the "field assessment was conducted on the 22-23rd of August 2000", less than one month before the *VMA 1999* became legislation. The Herbarium vegetation data for the Regional Ecosystems was available at the time of the field assessment, with the Certified RE mapping available to the general public on the 15th September 2000. Considering that the *VMA 1999* was

initially due to be legislated early in 2000 and was widely published, PPK had reasonable access to the information SIRA is now presenting.

- 6/ The PPK study failed to identify 2 **Endangered** ecosystems, one near the northern quarry start point of the routes in the Lake Manchester Road area and the other at the southern end in the Thornton Road area. Both these Endangered Dominant ecosystems (12.3.3 100% and 12.3.3/12.9-10.7/12.9-10.3 60/30/10%) are intersected by options A, B, C, D, E, F, G and H and would severely impact on these ecosystems' ability to maintain ecological process.
- 7/ The PPK vegetation survey 4.2.5.3 states, "Some small, highly degraded patches of riparian vegetation also exist along some of the route options, including the Brisbane River crossing". Analysis of the Herbarium data shows that on the northern bank there is **endangered dominant** ecosystem of 12.3.3 and on the southern bank of the river there is **of concern dominant** ecosystem 12.11.14/12.9-10.7, 90/10%, stretching for over 1 km in distance.
- 8/ A comparison of the field site data recorded by PPK (Refer Attachment D – PPK Report) and the Certified Regional Ecosystem (RE) mapping by Department of Natural Resources revealed significant differences between the types of regional ecosystems PPK found and the types of regional ecosystems mapped by the Department of Natural Resources. For example:
- PPK's sites 4 &5 are recorded as 12.9-10.2 whilst the Certified RE mapping shows 12.11.6/12.12.5/12.11.5/12.11.11 (70/15/10/5%)
 - PPK's sites 14&12 are recorded as 12.9-10.2 whilst the Certified RE mapping shows 12.9-10.2/12.9-10.17/12.9-10.7/12.9-10.19 (40/30/20/10%)
- 9/ A number of other inconsistencies relating to position descriptions contained within the report and the location of these sites on the PPK maps.

Appendix (1)

Regional Ecosystems Intersecting Proposed Haulage Routes Centre-lines

Brisbane City Council

VMA Policy	RE Summary	RE (%)
Not Of Concern	12.11.6/12.12.5/12.11.5/12.11.11	70/15/10/5
Not Of Concern	12.11.6/12.12.5/12.11.5/12.11.11	70/15/10/5
Endangered -dominant	12.3.3	100
Not Of Concern	12.12.5	100
Not Of Concern	12.11.6	100
Of Concern - Dominant	12.11.14/12.9-10.7	90/10
Of Concern - Dominant	12.11.14/12.9-10.7	90/10
Of Concern - Dominant	12.11.14/12.9-10.7	90/10
Of Concern - Subdominant	12.9-10.2/12.9-10.17/12.9-10.7/12.9-10.19	40/30/20/10
Of Concern - Subdominant	12.9-10.2/12.9-10.17/12.9-10.7/12.9-10.19	40/30/20/10
Of Concern - Subdominant	12.9-10.2/12.9-10.17/12.9-10.7/12.9-10.19	40/30/20/10
Not Of Concern	12.9-10.2	100

Ipswich City Council

VMA Policy	RE Summary	RE (%)
Of Concern - Subdominant	12.9-10.2/12.9-10.17/12.9-10.7/12.9-10.19	40/30/20/10
Of Concern - Subdominant	12.9-10.2/12.9-10.17/12.9-10.7/12.9-10.19	40/30/20/10
Of Concern - Dominant	12.9-10.3	100
Endangered -dominant	12.3.3/12.9-10.7/12.9-10.3	60/30/10
Of Concern - Dominant	12.9-10.7/12.9-10.19	90/10